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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

STEFAN KARLE

Munich, Germany

Plaintiff,

V.

THE RAG PLACE RENTALS, INC.

and

THE RAG PLACE, INC.

710 Jessie Street  
San Fernando, CA 91340

Defendants.

Case No.:

## JURY TRIAL DEMANDED

## COMPLAINT FOR TRADEMARK INFRINGEMENT, UNFAIR COMPETITION, DECEPTIVE TRADE PRACTICES

Plaintiff, Stefan Karle (“Karle” or “Plaintiff”) by and for his complaint against Defendants, The Rag Place Rentals, Inc. and The Rag Place, Inc. (collectively “TRP”), hereby alleges as follows:

## THE PARTIES



1           7.       Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c), because TRP  
2 resides in and is incorporated under the laws of the State of California, TRP does business in  
3 California, and the infringement and other acts complained of herein occurred within California and  
4 this District, and because TRP is subject to personal jurisdiction in this District.

5  
6                                   **FACTUAL BACKGROUND**

7           8.       Plaintiff Stefan Karle (“Karle”), an individual, is a longtime member of the German  
8 Society of Cinematographers with decades of experience in the movie and television industry.  
9 Using knowledge gained from his background in cinematography, Karle identified various needs for  
10 improvement in the cinema arts and thereafter manifested these improvements through his personal  
11 innovations in cinema lighting.

12           9.       More specifically, Karle is an inventor of light shaping and refining tools which  
13 embody compact and lightweight configurations, that are easier to use and faster to set up by  
14 cinema lighting professionals such as “gaffers” (i.e., the heads of the lighting and electrical  
15 departments on film sets). These inventions have not only been lauded by the industry but have also  
16 been recognized as worthy of protection by patents by the United States Patent and Trademark  
17 Office (“USPTO”), and by other patent offices in other countries worldwide. Karle was also granted  
18 trademarks, such as SNAPBAG®, SNAPGRID®, RABBIT-EARS® and RABBIT-ROUNDER®  
19 (see details *infra*), which were registered with the USPTO, and which – when used in association  
20 with Karle’s pioneering products – let consumers readily ascertain the origin of his lighting  
21 innovations.  
22  
23

24           10.     In order to commercialize his innovations, Karle founded the company DoPChoice  
25 GmbH (“DoPChoice”) in the year 2008, which is also headquartered in Munich, Germany, to which  
26 Karle licensed certain intellectual property (“IP”). To aid expansion of sales within the United  
27 States, DoPChoice – in turn – licensed certain IP rights to commercialize Karle’s innovations to the  
28

1 companies The Rag Place Rentals, Inc. and The Rag Place, Inc. (collectively “TRP”), which have  
2 business locations in or near Hollywood, California.

3 11. The licensing of IP rights to TRP began on or around April 27, 2017 (or April 1,  
4 2017, depending on license interpretation). Although the license allowed for TRP to renew after  
5 every two-year term (if certain conditions were met), and there is a dispute between DoPChoice and  
6 TRP as to whether TRP ever renewed the license, it is nevertheless unequivocal that DoPChoice  
7 terminated the license between the juristic entities no later than July 16, 2024.  
8

9 12. In spite of the termination of the license by DoPChoice, and despite DoPChoice’s  
10 express demands that TRP cease its continued use of the intellectual property formerly licensed to it  
11 by DoPChoice, TRP continues to sell Karle’s lighting products (or imitations thereof), using Karle’s  
12 trademarks, thereby causing confusion as to the origin of the lighting goods. Worse, TRP uses its  
13 own trademarks in association with Karle’s trademarks, sending a clear but incorrect message to  
14 consumers that TRP, and not Karle, is the origin of the lighting products innovated by Karle.  
15 Compounding the harm, consumers have blamed DoPChoice for problems with lighting goods sold  
16 by TRP, believing them to be of DoPChoice (or Karle) origin because of TRP’s unauthorized use of  
17 DoPChoice’s trademarks.  
18

19 13. The harm being caused by TRP’s unauthorized use of Karle’s intellectual property,  
20 and specifically his trademarks, is irreparable, and will become further irreparable, unless it is  
21 enjoined.  
22

### 23 **KARLE’S REGISTERED TRADEMARKS**

24 14. Karle is the owner of the following duly and legally issued U.S. Trademark  
25 Registrations:

#### 26 **SNAPGRID**

- 27 • U.S. Trademark Registration No. 4,233,949 for the mark SNAPGRID (“the ‘949  
28

1 registration”) for “photographic lighting equipment, namely, light shapers, light modifiers,  
2 light formers.” (Exhibit 1)

3 **SNAPBAG**

- 4 • U.S. Trademark Registration No. 4,482,542 for the mark SNAPBAG (“the ‘542  
5 registration”) for “photographic lighting equipment, namely, light shapers, light modifiers,  
6 light formers, light reflectors, softboxes.” (Exhibit 2)

8 **RABBIT-EARS**

- 9 • U.S. Trademark Registration No. 5,208,246 for RABBIT-EARS (“the ‘246  
10 registration”) for “electrical photographic lighting equipment for use in professional  
11 photography, namely, light shapers, light modifiers, light formers, light reflectors, adaptor  
12 frames for interconnecting light formers with a light source.” (Exhibit 3)

14 **RABBIT-ROUNDER**

- 15 • U.S. Trademark Registration No. 6,661,908 for RABBIT-ROUNDER (“the ‘908  
16 registration”) for “electrical photographic lighting equipment for use in professional quality  
17 photography, namely, light shapers, light modifiers, light formers, light reflectors, adaptor  
18 frames for interconnecting light formers with a light source.” (Exhibit 4)

19 **TRP’S INFRINGING PRODUCTS**

20 15. TRP promotes and sells various cinema lighting products using Karle’s  
21 SNAPBAG®, SNAPGRID®, RABBIT-EARS® and RABBIT-ROUNDER® trademarks, along  
22 with its own trademarks (e.g., “TRP WORLDWIDE”), thereby confusing consumers that TRP, and  
23 not Karle, is the origin of the lighting products innovated by Karle. (See Exhibits 5-8)

25 16. TRP’s infringing products are sold from its own e-commerce website portal as well  
26 as from various online retail outlets, including at B&H and Adorama, under various names for  
27 cinema lighting products, each name prominently utilizing and therefore displaying TRP’s  
28

1 trademark (“TRP WORLDWIDE”) alongside one or more of Karle’s trademarks, such as in the  
2 examples listed below:

3 TRP WORLDWIDE SNAPBAG

4 TRP WORLDWIDE SNAPGRID

5 TRP WORLDWIDE SNAPBAG and SNAPGRID

6 TRP WORLDWIDE SNAPGRID with SNAPBAG

7 TRP WORLDWIDE SNAPBAG with RABBIT-EARS

8 TRP WORLDWIDE SNAPBAG with RABBIT ROUNDER

9 TRP WORLDWIDE RABBIT-EARS

10 (See Exhibits 5-8).

11  
12 17. TRP’s infringing products have also been displayed at tradeshow, including at  
13 Cinegear Expo in Atlanta on October 4-5, 2024, where TRP prominently displayed its TRP  
14 WORLDWIDE marks alongside infringing products, including SNAPBAG® products (See photos  
15 from tradeshow at Exhibit 9). TRP’s infringement of Karle’s registered trademarks at the Expo was  
16 highlighted by TRP’s profile, as follows:

17  
18 **About TRP Worldwide, Inc.**

19 The Rag Place is the premier source for Motion Picture Technical Fabrics and the innovative  
20 SNAP system LED lighting accessories, which provide quick set-up, effective lighting  
21 control, and a universal mounting solution for attaching SNAPBAGS® to LED fixtures.  
22 Booth 30!

23 (Exhibit 10).

24 18. Actual consumer confusion as to the source of TRP’s infringing products also exists.  
25 An example of actual confusion occurred recently when one of TRP’s customers contacted Karle  
26 complaining about the poor quality of a TRP WORLDWIDE SNAPBAG® product he purchased in  
27 August 2024 at a U.S. dealer (B&H). The customer described his disappointment that on the same  
28 day after receiving a TRP WORLDWIDE SNAPBAG® product “one of the corner elastics ripped

1 free” of its stitching the first time it was mounted to the lighting fixture. (Exhibit 11) The damaged  
2 TRP WORLDWIDE SNAPBAG® product is also shown in Exhibit 11 (showing a corner elastic  
3 ripped from the stitching). Karle responded to the customer’s complaint, writing:

4 I am Stefan Karle, the owner and founder of DoPchoice.  
5 Hearing this story it does not make me happy! And I want to find a quick fix!

6 Background: **This product was produced by our old Partner TRPworldwide.**  
7 **We stopped in the meanwhile working with them.**

8 But this should not be your problem, we want to delivery you a great product  
and therefore it does not matter where it is coming from.

9 (*Id.* (emphasis added)). Karle then asked the customer to send a picture of the damaged  
10 SNAPBAG® product and label (shown in Exhibit 11), and once received, Karle shipped to the  
11 customer “a DoPchoice made product directly from Germany free of charge.” (*Id.*)

12 19. TRP’s infringing cinema lighting products directly and slavishly copy Karle’s  
13 products and registered trademarks, and therefore are likely to cause confusion with, and therefore  
14 infringe Karle’s trademark registrations. Specifically, consumers are likely to confuse Karle’s and  
15 TRP’s products as originating from the same source.

17 20. TRP uses the same advertising, promotion and distribution channels as Karle and  
18 DoPChoice. Moreover, because TRP uses the identical trademarks as Karle’s registered trademarks  
19 for the same uses identified for the registered trademarks, and in association with slavish copies of  
20 DoPChoice’s products, TRP’s customers confusingly believe, or at least are likely to believe, that  
21 TRP is an authorized source of Karle’s trademarked products. TRP is not authorized.

23 21. TRP’s current promotion and sale of infringing products is intentionally designed to  
24 trade off of the good will and market created by Karle, and otherwise is a deliberate effort to  
25 infringe Karle’s registered trademarks and to unfairly compete with Karle. This intentional effort to  
26 cause confusion also increases the likelihood of confusion amongst the products, and between TRP  
27 and Karle’s trademark registrations.  
28

1           22.     TRP's adoption of trademarks that are identical to and confusingly the same as  
2 Karle's registered trademarks on the identical products for the identical uses, and TRP's offering of  
3 the products for sale to the same customers using the same distribution channels is likely to lead  
4 consumers to believe that TRP's products are authorized by or otherwise associated with Karle.

5           23.     TRP is well aware of the reputation and goodwill associated with Karle's trademarks  
6 and is intentionally attempting to attract the benefit of same to itself through its conduct.

7           24.     By virtue of TRP's unlawful association of its business with Karle's trademarks, it is  
8 attempting to unlawfully enhance the sale of its products.

9           25.     As a result of its unauthorized actions, TRP has misled the public into believing that  
10 its products are connected with Karle, and/or are licensed, endorsed and/or approved by Karle.

11           26.     Karle has been damaged by TRP's infringement and unfair competition both  
12 financially and in price and quality reputation.  
13  
14

15                               **COUNT ONE**

16                   **Federal Trademark Infringement and Unfair Competition [15 U.S.C. § 1114]**

17           27.     Karle reasserts and realleges all of the allegations contained in the foregoing  
18 paragraphs as though the same were fully set forth herein.

19           28.     This claim arises under the Lanham Act, particularly under 15 U.S.C. § 1114.

20           29.     TRP's unauthorized use of the word "SNAPGRID" on its products and product  
21 packaging constitutes infringement of Karle's '949 registration for the mark "SNAPGRID" for  
22 "photographic lighting equipment, namely, light shapers, light modifiers, light formers."  
23

24           30.     TRP's unauthorized use of the word "SNAPBAG" on its products and product  
25 packaging constitutes infringement of Karle's '542 registration for "photographic lighting  
26 equipment, namely, light shapers, light modifiers, light formers, light reflectors, softboxes."  
27

28           31.     TRP's unauthorized use of the words "RABBIT-EARS" on its products and product  
packaging constitutes infringement of Karle's '246 registration for "electrical photographic lighting



1 equipment for use in professional photography, namely, light shapers, light modifiers, light formers,  
2 light reflectors, adaptor frames for interconnecting light formers with a light source.”

3 32. TRP’s unauthorized use of the words “RABBIT-ROUNDER” on its products and  
4 product packaging constitutes infringement of Karle’s ‘908 registration for “electrical photographic  
5 lighting equipment for use in professional quality photography, namely, light shapers, light  
6 modifiers, light formers, light reflectors, adaptor frames for interconnecting light formers with a  
7 light source.”

8  
9 33. TRP’s unauthorized actions constitute false designation of origin or sponsorship of  
10 its products and tend falsely to represent that TRP’s products originate from Karle or that TRP’s  
11 products and/or TRP has been sponsored, approved, or licensed by Karle or is in some way  
12 affiliated or connected with Karle. Such conduct is likely to confuse, mislead and deceive  
13 customers, purchasers, and members of the public as to the origin of TRP’s products or cause said  
14 persons to believe that those products and/or TRP has been sponsored, approved, authorized, or  
15 licensed by Karle or are in some way affiliated or connected with Karle, all in violation of 15  
16 U.S.C. § 1114. Moreover, in some cases, some customers have been actually confused.

17  
18 34. TRP has been on actual notice that its use of Karle’s trademarks is unauthorized  
19 since at least July 16, 2024. For this reason and others stated herein, it is believed that TRP’s actions  
20 are done and continue to be done willfully, with full knowledge of Karle’s exclusive rights in its  
21 federally registered trademarks and with the express intent to cause confusion and to mislead and  
22 deceive the purchasing public.

23  
24 **COUNT TWO**

25 **Federal Unfair Competition [15 U.S.C. § 1125(a)]**

26 35. Karle reasserts and realleges all of the allegations contained in the foregoing  
27 paragraphs as though the same were fully set forth herein.

28 36. This claim arises under the Lanham Act, particularly under 15 U.S.C. § 1125(a).

1 37. TRP's unauthorized use of infringing trademarks began after Karle's use of the  
2 trademarks in commerce and constitutes false designation of origin or sponsorship of its products  
3 and tends falsely to represent that TRP's products originate from Karle or that TRP's products  
4 and/or TRP has been sponsored, approved, or licensed by Karle or is in some way affiliated or  
5 connected with Karle. Such conduct is likely to confuse, mislead and deceive TRP's customers,  
6 purchasers, and members of the public as to the origin of TRP's products or cause said persons to  
7 believe that TRP's products and/or TRP has been sponsored, approved, authorized, or licensed by  
8 Karle or are in some way affiliated or connected with Karle, all in violation of 15 U.S.C. § 1125(a).  
9

10 38. TRP has been on actual notice that its use of Karle's trademarks is unauthorized  
11 since at least July 16, 2024. For this reason and others stated herein, it is believed that TRP's actions  
12 were done and continue to be done willfully, with full knowledge of Karle's exclusive rights in its  
13 trademarks and with the express intent to cause confusion and to mislead and deceive the  
14 purchasing public.  
15

16 **COUNT THREE**

17 **California Unfair Competition Law (UCL) [Cal. Bus. & Prof. Code § 17200 *et seq.*]**

18 39. Karle reasserts and realleges all of the allegations contained in the foregoing  
19 paragraphs as though the same were fully set forth herein.  
20

21 40. This claim arises under the California UCL, Cal. Bus. & Prof. Code § 17200.

22 41. At all relevant times of the allegations made in this Complaint, the California UCL,  
23 Cal. Bus. & Prof. Code § 17200 was in effect in California.

24 42. TRP's unlawful, unfair, or fraudulent use of Karle's trademarks has caused and,  
25 unless enjoined by this Court, will continue to cause a likelihood of confusion or misunderstanding  
26 as to the source, sponsorship, approval and/or certification of TRP's products.  
27

28 43. Such knowing and willful conduct described above constitutes unfair competition  
within the meaning of the California UCL, Cal. Bus. & Prof. Code § 17200. As a result of such

1 conduct, Karle has suffered and will continue to suffer immediate and irreparable harm to his  
2 business, goodwill and reputation, for which Karle lacks an adequate remedy at law.

3 44. In addition to the irreparable harm to Karle caused by reason of TRP's acts, Karle  
4 has suffered and will continue to suffer monetary damages in an amount not yet determined.

5 45. Karle is entitled to entry of preliminary and permanent injunctive relief prohibiting  
6 TRP from its unlawful, unfair, or fraudulent use of Karle's trademarks in violation of the California  
7 UCL, Cal. Bus. & Prof. Code § 17200.

8 46. TRP's willful conduct entitles Karle to a recovery of his attorney fees.

9  
10 **COUNT FOUR**

11 **Unfair Competition Under California Common Law**

12 47. Karle reasserts and realleges all of the allegations contained in the foregoing  
13 paragraphs as though the same were fully set forth herein.

14 48. This claim arises under the common law of the State of California.

15 49. TRP's unauthorized acts as alleged above constitute unfair competition in violation  
16 of California common law.

17 50. TRP's unauthorized use of infringing trademarks constitutes false designation of  
18 origin or sponsorship of its product and tends falsely to represent that TRP's products originate  
19 from Karle or that TRP's products and/or TRP has been sponsored, approved, or licensed by Karle  
20 or is in some way affiliated or connected with Karle. Such conduct is likely to confuse, mislead and  
21 deceive TRP's customers, purchasers, and members of the public as to the origin of TRP's products  
22 or cause said persons to believe that TRP's products and/or TRP has been sponsored, approved,  
23 authorized, or licensed by Karle or are in some way affiliated or connected with Karle, all in  
24 violation of California common law.

25 51. TRP has been on actual notice that its use of Karle's trademarks is unauthorized  
26 since at least July 16, 2024. For this reason and others stated herein, it is believed that TRP's actions  
27  
28

1 were done and continue to be done willfully, with full knowledge of Karle's exclusive rights in its  
2 trademarks and with the express intent to cause confusion and to mislead and deceive the  
3 purchasing public.

4 **WHEREFORE**, Karle requests that the Court:

5  
6 1. Grant a preliminary and permanent injunction restraining and enjoining TRP and any  
7 and all principals, officers, agents, servants, employees, attorneys, representatives, successors and  
8 assigns of TRP, and all those in privity, concert or participation with TRP and all those who receive  
9 actual notice of the order, from:

10 (i) directly or indirectly infringing Karle's trademarks in any manner, including  
11 generally, but not limited to, by manufacturing, distributing, advertising, selling, and/or  
12 offering for sale any goods or services that infringe Karle's trademarks, and specifically:

- 13 a. using the words "SNAPGRID", "SNAPBAG", "RABBIT-EARS", or  
14 "RABBIT-ROUNDER" on its products and packaging, in connection with the  
15 manufacture, distribution, advertising, sale, offering for sale, and/or other use of  
16 photographic lighting equipment;  
17  
18 b. applying the words "SNAPGRID", "SNAPBAG", "RABBIT-EARS", or  
19 "RABBIT-ROUNDER", to any label, sign, print, package, wrapper, receptacle,  
20 website, or advertisement used in connection with the manufacture, distribution, sale,  
21 and/or offering for sale, of photographic lighting equipment;

22  
23 (ii) using any trademark, trade name, trade dress, logo, design or domain name that tends  
24 falsely to represent that or is likely to confuse, mislead, or deceive purchasers, TRP's  
25 customers, or members of the public to the effect that goods manufactured, distributed,  
26 advertised, sold and/or offered for sale by TRP originate from Karle, or that said goods have  
27 been sponsored, approved, or licensed by or associated with Karle or are in some way  
28 connected or affiliated with Karle;

- 1 (iii) engaging in any conduct that tends falsely to represent that, or is likely to confuse,  
2 mislead, or deceive purchasers, TRP's customers, and/or members of the public to the effect  
3 that the actions of TRP are sponsored, approved, or licensed by Karle, or is in some way  
4 connected or affiliated with Karle;
- 5 (iv) affixing, applying, or annexing to or using in connection with the manufacture,  
6 distribution, advertising, sale, and/or offering for sale or other use of any goods or services,  
7 a false description or representation, including words, domain names or other symbols,  
8 tending to falsely describe or represent such goods or services as being those of Karle;
- 9 (v) otherwise competing unfairly with Karle in any manner;
- 10 (vi) destroying or otherwise disposing of any of the hereinabove mentioned products, or  
11 any documents pertaining to them or their acquisition or to any sales or transfer thereof  
12 heretofore made; and
- 13 (vii) assisting, aiding or abetting another person or business entity in engaging or  
14 performing any of the activities enumerated in subparagraphs (i) through (vi) above.

15 2. Render a determination that the SNAPGRID®, SNAPBAG®, RABBIT-EARS®, and  
16 RABBIT-ROUNDER® trademarks are valid and enforceable.

17 3. Find that TRP has infringed Karle's trademarks and competed unfairly in violation  
18 of federal law by the acts complained of herein.

19 4. Find that TRP has utilized false designations of origin and/or false descriptions in  
20 violation of federal law by the acts complained of herein.

21 5. Find that TRP has competed unfairly in violation of California statutory and  
22 common law by the acts complained of herein.

23 6. Issue an order requiring TRP and any and all principals, officers, agents, servants,  
24 employees, attorneys, successors, and assigns, and all those in active privity or concert with TRP  
25

1 who receive actual notice of said order, to deliver to Karle for destruction all infringing goods in  
2 their possession or under their control which bear the infringing trademarks.

3 7. Issue an order requiring recall of any infringing goods sold and requiring TRP to  
4 issue written notices to all those previously offered the infringing goods and those to whom the  
5 infringing goods have been sold notifying them of the injunctions.

6 8. Require TRP to disseminate corrective advertising, at TRP's expense and subject to  
7 Karle's approval, that informs consumers, the trade and the public at large of TRP's unlawful  
8 conduct as complained of herein and of the judgment requiring TRP to cease such unlawful  
9 conduct, and/or require TRP to pay Karle's costs in producing and disseminating such corrective  
10 advertising.

11 9. Direct TRP to file with this Court and serve on counsel for Karle, within thirty (30)  
12 days after entry of the injunctions, a written report under oath setting forth in detail the manner in  
13 which TRP has complied with the foregoing paragraphs.

14 10. Direct TRP to provide an accounting of profits made by TRP as a result of TRP's  
15 unlawful conduct.

16 11. Order TRP to pay a judgment in the amount of Karle's actual damages under 15  
17 U.S.C. § 1117 and/or California law, as well as TRP's profits, and pre- and post-judgment interest  
18 pursuant to 15 U.S.C. § 1117 and 28 U.S.C. § 1961, in an amount to be proven at trial.

19 12. Award to Karle his attorneys' fees, due to the exceptional nature of this case, and all  
20 of Karle's costs and expenses of litigation, pursuant to 15 U.S.C. § 1117(a) and/or California law.

21 13. Order TRP to pay a judgment for enhanced damages under 15 U.S.C. § 1117, and  
22 punitive damages under California law as appropriate.

23 14. Grant to Karle such other and further relief as the Court may deem just, proper and  
24 equitable under the circumstances.

**DEMAND FOR JURY TRIAL**

Pursuant to Fed. R. Civ. P. 38(b), Karle hereby demands a jury trial on all issues so triable.

Respectfully submitted,

Dated: December 19, 2024

/s/ Sarah Woodson

Sarah Woodson

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